

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LIVEVIDEO.AI CORP.

Plaintiff,

v.

SHARI REDSTONE, NATIONAL
AMUSEMENTS, INC., CHRISTINE VARNEY,
MONICA SELIGMAN

Defendants.

C.A. No. 1:24-CV-6290 (DEH)
(BCM)

DECLARATION OF ANI-RAE LOVELL

I, Ani-Rae Lovell, declare as follows:

1. I am a member in good standing of the bar of the State of New York. I am associated with the firm Ropes & Gray LLP, attorneys for Defendant National Amusements, Inc. (“NAI”) in the above-captioned matter.

2. I submit this declaration in support of NAI’s Memorandum of Law in Support of its Motion for Sanctions under Fed. R. Civ. P. 11 and the Court’s Inherent Powers filed concurrently herewith. For the convenience of the Court, copies of certain documents referenced in the Memorandum of Law are attached hereto as follows:

a. Exhibit 1 is a true and correct copy of a Motion and Memorandum of Law in Support of Brad Greenspan’s Motion to Intervene filed by Brad Greenspan in the United States District Court for the District of Columbia in the action entitled *United States v. Google LLC*, Case No. 1:20-cv-03010-APM, on November 16, 2023.

b. Exhibit 2 is a true and correct copy of the Complaint (exhibits appended to original Complaint omitted) filed by Brad Greenspan in the Superior Court of New Jersey,

Chancery Division, Essex County in the action entitled *Greenspan v. Muijrsers*, Case No. ESX C-000124-21, on July 19, 2021.

c. Exhibit 3 is a true and correct copy of the Complaint filed by counsel for Palisades Capital, Inc. in the United States District Court for the District of New Jersey in the action entitled *Palisades Capital, Inc. v. Muijrsers*, Case No. 2:21-cv-20054, on November 17, 2021.

d. Exhibit 4 is a true and correct copy of the Complaint (exhibits appended to original Complaint omitted) filed by counsel for LiveUniverse, Inc. in the United States District Court for the District of New Jersey in the action entitled *LiveUniverse, Inc. v. Muijrsers*, Case No. 2:22-cv-04918, on August 4, 2022.

e. Exhibit 5 is a true and correct copy of the Arkansas Secretary of State Incorporation record for Palisades Capital, Inc., which identifies “Bradley Greenspan” as “Incorporator/Organizer” and “Brad D Greenspan” as “President,” obtained from <https://www.ark.org/corp-search/index.php/corps/results> on February 25, 2025.

f. Exhibit 6 is a true and correct copy of the State of New Jersey Department of the Treasury Division of Revenue & Enterprise Services Business Name Search result listing the incorporation date for LiveUniverse Inc. as May 27, 2021, obtained from <https://www.njportal.com/DOR/BusinessNameSearch/Search/BusinessName> on February 25, 2025.

g. Exhibit 7 is a true and correct copy of a letter dated November 6, 2024, from LiveUniverse, Inc., signed by Brad Greenspan as “President,” to Magistrate Judge James B. Clark, III, filed in the United States District Court for the District of New Jersey in the

action entitled *LiveUniverse, Inc. v. Muijrrers*, Case No. 2:22-cv-04918, on November 7, 2024.

h. Exhibit 8 is a true and correct copy of the Order Denying Motion to Intervene issued by Judge Lucy H. Koh of the United States District Court for the Northern District of California in the action entitled *In Re: High-Tech Employee Antitrust Litig.*, Case No. 5:11-cv-02509-LHK, on July 8, 2014.

i. Exhibit 9 is a true and correct copy of an Amended Declaration of Leslie A. Farber, counsel for LiveUniverse, Inc., filed in the United States District Court for the District of New Jersey in the action entitled *LiveUniverse, Inc. v. Muijrrers*, Case No. 2:22-cv-04918, on October 3, 2022.

j. Exhibit 10 is a true and correct copy of a letter dated May 22, 2023, from Howard Gutman, counsel for LiveUniverse, Inc., to Magistrate Judge James B. Clark, III, filed in the United States District Court for the District of New Jersey in the action entitled *LiveUniverse, Inc. v. Muijrrers*, Case No. 2:22-cv-04918, on May 22, 2023.

k. Exhibit 11 is a true and correct copy of a letter dated June 27, 2023, from Howard A. Gutman, counsel for LiveUniverse, Inc., to Magistrate Judges James B. Clark, III, filed in the United States District Court for the District of New Jersey in the action entitled *LiveUniverse, Inc. v. Muijrrers*, Case No. 2:22-cv-04918, on June 27, 2023.

l. Exhibit 12 are true and correct copies of Proofs of Service filed by Alfred Constants in the United States District Court for the District of New Jersey in the action entitled *LiveUniverse, Inc. v. Muijrrers*, Case No. 2:22-cv-04918, on November 7, 2023.

m. Exhibit 13 is a true and correct copy of Kevin DiMedio, Esq.'s Supporting Certification as to Motion to Withdraw as Counsel for Plaintiff, filed in the United States

District Court for the District of New Jersey in the action entitled *LiveUniverse, Inc. v. Muijrsers*, Case No. 2:22-cv-04918, on September 30, 2024.

n. Exhibit 14 is a true and correct copy of the Notice of Motion for Sanctions and cover letter served by counsel to NAI via email on counsel for LiveVideo.AI, Alfred Constants III, on December 30, 2024.

3. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: February 26, 2025

/s/ Ani-Rae Lovell
Ani-Rae Lovell